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&  
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P: 920.469.9099 • F: 920.469.4418 (Phyto)

May 24, 2004

Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 810  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Whole Heart Multivitamin™	Clinical research has also shown that maintaining healthy cholesterol and homocysteine levels, as well as intake of antioxidants, promotes cardiovascular health.*	Vitamin A (75% as beta carotene and as retinyl acetate), Vitamin C (ascorbic acid), Vitamin D (as cholecalciferol), Vitamin E (as d-alpha tocopheryl acid succinate), Thiamin (as thiamin HCl) (vitamin B1), Riboflavin (vitamin B2), Niacin (as niacinamide and niacin), Vitamin B6 (as pyridoxine HCl), Folic Acid, Vitamin B12 (as cyanocobalamin), Biotin, Pantothenic Acid (as calcium D-pantothenate), Calcium (as calcium carbonate and calcium citrate), Iodine (as potassium iodide), Magnesium (as magnesium aspartate and magnesium oxide), Zinc (as zinc gluconate), Selenium (as L-selenomethionine), Copper (as copper gluconate), Manganese (as manganese citrate), Chromium (as chromium picolinate), Molybdenum (as sodium molybdate), Sodium, Choline Bitartrate, Alpha Lipoic Acid, Lycopene, Lutein (from Calendula officinalis), Vanadium (as vanadyl sulfate), Zeaxanthin (from Calendula officinalis)

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I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By:  \_\_\_\_\_

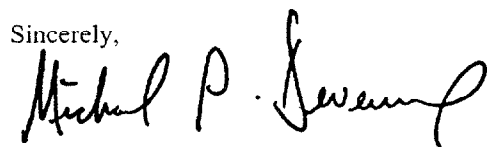
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/24/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,



Michael P. Devereux  
Chief Financial Officer



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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Whole Heart Multivitamin™	In clinical studies, use of multivitamins, containing B vitamins and folate, has been shown to also significantly reduce levels of homocysteine.*	Vitamin A (75% as beta carotene and as retinyl acetate), Vitamin C (ascorbic acid), Vitamin D (as cholecalciferol), Vitamin E (as d-alpha tocopheryl acid succinate), Thiamin (as thiamin HCl) (vitamin B1), Riboflavin (vitamin B2), Niacin (as niacinamide and niacin), Vitamin B6 (as pyridoxine HCl), Folic Acid, Vitamin B12 (as cyanocobalamin), Biotin, Pantothenic Acid (as calcium D-pantothenate), Calcium (as calcium carbonate and calcium citrate), Iodine (as potassium iodide), Magnesium (as magnesium aspartate and magnesium oxide), Zinc (as zinc gluconate), Selenium (as L-selenomethionine), Copper (as copper gluconate), Manganese (as manganese citrate), Chromium (as chromium picolinate), Molybdenum (as sodium molybdate), Sodium, Choline Bitartrate, Alpha Lipoic Acid, Lycopene, Lutein (from Calendula officinalis), Vanadium(as vanadyl sulfate), Zeaxanthin (from Calendula officinalis)

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By: 

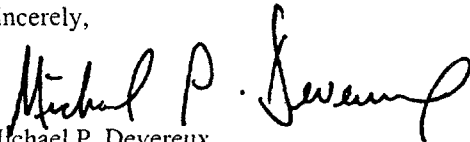
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/24/04

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Sincerely,



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Chief Financial Officer



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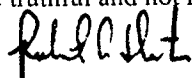
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Whole Heart Multivitamin™	Lower homocysteine levels have been shown to support healthy heart function.*	Vitamin A (75% as beta carotene and as retinyl acetate), Vitamin C (ascorbic acid), Vitamin D (as cholecalciferol), Vitamin E (as d-alpha tocopheryl acid succinate), Thiamin (as thiamin HCl) (vitamin B1), Riboflavin (vitamin B2), Niacin (as niacinamide and niacin), Vitamin B6 (as pyridoxine HCl), Folic Acid, Vitamin B12 (as cyancobalamin), Biotin, Pantothenic Acid (as calcium D-pantothenate), Calcium (as calcium carbonate and calcium citrate), Iodine (as potassium iodide), Magnesium (as magnesium aspartate and magnesium oxide), Zinc (as zinc gluconate), Selenium (as L-selenomethionine), Copper (as copper gluconate), Manganese (as manganese citrate), Chromium (as chromium picolinate), Molybdenum (as sodium molybdate), Sodium, Choline Bitartrate, Alpha Lipoic Acid, Lycopene, Lutein (from Calendula officinalis), Vanadium(as vanadyl sulfate), Zeaxanthin (from Calendula officinalis)

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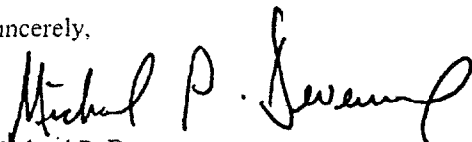
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

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Chief Financial Officer



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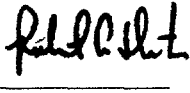
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Whole Heart Multivitamin™	Whole Health Multivitamin™ is a full spectrum multivitamin featuring key nutrients for targeted heart health.*	Vitamin A (75% as beta carotene and as retinyl acetate), Vitamin C (ascorbic acid), Vitamin D (as cholecalciferol), Vitamin E (as d-alpha tocopheryl acid succinate), Thiamin (as thiamin HCl) (vitamin B1), Riboflavin (vitamin B2), Niacin (as niacinamide and niacin), Vitamin B6 (as pyridoxine HCl), Folic Acid, Vitamin B12 (as cyanocobalamin), Biotin, Pantothenic Acid (as calcium D-pantothenate), Calcium (as calcium carbonate and calcium citrate), Iodine (as potassium iodide), Magnesium (as magnesium aspartate and magnesium oxide), Zinc (as zinc gluconate), Selenium (as L- selenomethionine), Copper (as copper gluconate), Manganese (as manganese citrate), Chromium (as chromium picolinate), Molybdenum (as sodium molybdate), Sodium, Choline Bitartrate, Alpha Lipoic Acid, Lycopene, Lutein (from Calendula officinalis), Vanadium(as vanadyl sulfate), Zeaxanthin (from Calendula officinalis)

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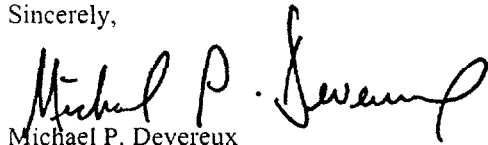
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Title: Senior Vice President of Scientific Affairs

Date: 5/26/04

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Sincerely,



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Chief Financial Officer





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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Whole Heart Multivitamin™	Elevated homocysteine levels and an inadequate intake of antioxidants are not supportive of optimal cardiovascular health.*	Vitamin A (75% as beta carotene and as retinyl acetate), Vitamin C (ascorbic acid), Vitamin D (as cholecalciferol), Vitamin E (as d-alpha tocopheryl acid succinate), Thiamin (as thiamin HCl) (vitamin B1), Riboflavin (vitamin B2), Niacin (as niacinamide and niacin), Vitamin B6 (as pyridoxine HCl), Folic Acid, Vitamin B12 (as cyanocobalamin), Biotin, Pantothenic Acid (as calcium D-pantothenate), Calcium (as calcium carbonate and calcium citrate), Iodine (as potassium iodide), Magnesium (as magnesium aspartate and magnesium oxide), Zinc (as zinc gluconate), Selenium (as L-selenomethionine), Copper (as copper gluconate), Manganese (as manganese citrate), Chromium (as chromium picolinate), Molybdenum (as sodium molybdate), Sodium, Choline Bitartrate, Alpha Lipoic Acid, Lycopene, Lutein (from Calendula officinalis), Vanadium(as vanadyl sulfate), Zeaxanthin (from Calendula officinalis)

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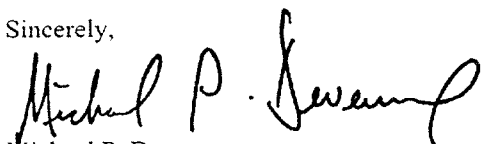
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Whole Heart Multivitamin™	Vitamins A, C and E are antioxidants that specifically support heart health.*	Vitamin A (75% as beta carotene and as retinyl acetate), Vitamin C (ascorbic acid), Vitamin E (as d-alpha tocopheryl acid succinate),

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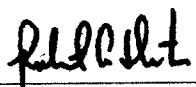
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Whole Heart Multivitamin™	Vitamins B6, B12 and folic acid have been shown in clinical studies to lower homocysteine levels.*	Vitamin B6 (as pyridoxine HCl), Folic Acid, Vitamin B12 (as cyanocobalamin)

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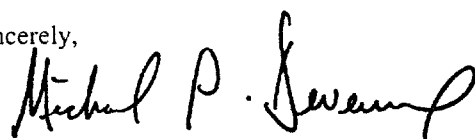
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Whole Heart Multivitamin™	Alpha lipoic acid, lycopene and lutein are also potent antioxidants.*	Alpha Lipoic Acid, Lycopene, Lutein (from Calendula officinalis)

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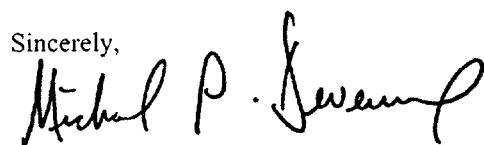
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Whole Heart Multivitamin™	Among regular users of supplemental vitamins, average serum homocysteine levels are reported to be 1.5 micromolar lower than those who do not supplement.*	Vitamin A (75% as beta carotene and as retinyl acetate), Vitamin C (ascorbic acid), Vitamin D (as cholecalciferol), Vitamin E (as d-alpha tocopheryl acid succinate), Thiamin (as thiamin HCl) (vitamin B1), Riboflavin (vitamin B2), Niacin (as niacinamide and niacin), Vitamin B6 (as pyridoxine HCl), Folic Acid, Vitamin B12 (as cyanocobalamin), Biotin, Pantothenic Acid (as calcium D-pantothenate), Calcium (as calcium carbonate and calcium citrate), Iodine (as potassium iodide), Magnesium (as magnesium aspartate and magnesium oxide), Zinc (as zinc gluconate), Selenium (as L-selenomethionine), Copper (as copper gluconate), Manganese (as manganese citrate), Chromium (as chromium picolinate), Molybdenum (as sodium molybdate), Sodium, Choline Bitartrate, Alpha Lipoic Acid, Lycopene, Lutein (from Calendula officinalis), Vanadium(as vanadyl sulfate), Zeaxanthin (from Calendula officinalis)

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By:  \_\_\_\_\_

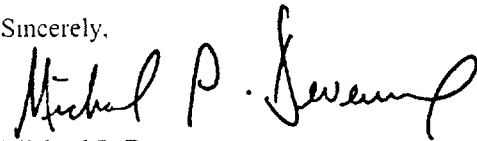
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/26/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,



Michael P. Devereux  
Chief Financial Officer



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P: 920.469.9099 • F: 920.469.4418 (Phyto)

May 26, 2004

Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 810  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740


RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Whole Heart Multivitamin™	A clinical study of over 500 people who added folic acid, Vitamin B6 and Vitamin B12 supplements to their diet, found that they experienced significant cardiovascular support.*	Vitamin B6 (as pyridoxine HCl), Folic Acid, Vitamin B12 (as cyanocobalamin)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

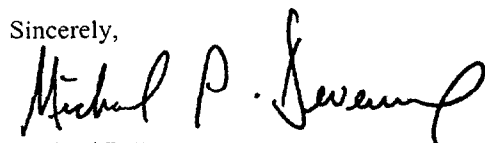
Robert C. Doster

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Whole Heart Multivitamin™	Antioxidants inhibit cell damaging oxidation and support healthy arteries.*	Vitamin A (75% as beta carotene and as retinyl acetate), Vitamin C (ascorbic acid), Vitamin D (as cholecalciferol), Vitamin E (as d-alpha tocopheryl acid succinate), Thiamin (as thiamin HCl) (vitamin B1), Riboflavin (vitamin B2), Niacin (as niacinamide and niacin), Vitamin B6 (as pyridoxine HCl), Folic Acid, Vitamin B12 (as cyanocobalamin), Biotin, Pantothenic Acid (as calcium D-pantothenate), Calcium (as calcium carbonate and calcium citrate), Iodine (as potassium iodide), Magnesium (as magnesium aspartate and magnesium oxide), Zinc (as zinc gluconate), Selenium (as L-selenomethionine), Copper (as copper gluconate), Manganese (as manganese citrate), Chromium (as chromium picolinate), Molybdenum (as sodium molybdate), Sodium, Choline Bitartrate, Alpha Lipoic Acid, Lycopene, Lutein (from Calendula officinalis), Vanadium(as vanadyl sulfate), Zeaxanthin (from Calendula officinalis)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

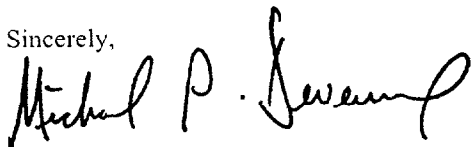
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/26/04

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Sincerely,



Michael P. Devereux  
Chief Financial Officer



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May 27, 2004

Office of Nutritional Products, Labeling &  
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5100 Paint Branch Parkway  
College Park, MD 20740

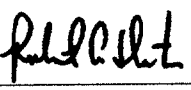
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Whole Heart Multivitamin™	Supports the function of cardiac mitochondria (energy producing cells.*	Vitamin A (75% as beta carotene and as retinyl acetate)

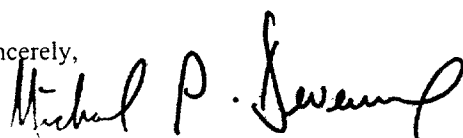
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Robert C. Doster

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Date: 5/27/04

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Whole Heart Multivitamin™	Maintains general health and vigor of epithelial cells.*	Vitamin A (75% as beta carotene and as retinyl acetate)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

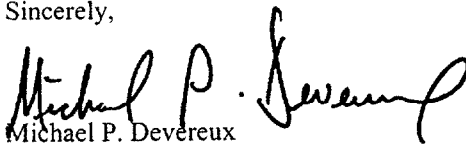
By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/27/04

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Sincerely,

  
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Chief Financial Officer



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May 27, 2004

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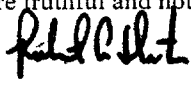
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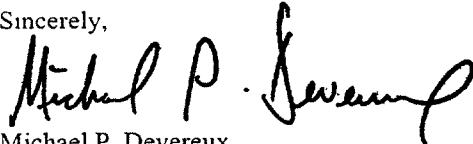
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Whole Heart Multivitamin™	Beta-carotene acts as an antioxidant to inactivate free radicals.*	Vitamin A (75% as beta carotene and as retinyl acetate)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By:   
Robert C. Doster  
Title: Senior Vice President of Scientific Affairs

Date: 5/27/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

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Michael P. Devereux  
Chief Financial Officer



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May 27, 2004

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5100 Paint Branch Parkway  
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RE: Label Claims/Disclaimers

Dear Sir or Madam:

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Whole Heart Multivitamin™	Supports the immune system.*	Vitamin C (ascorbic acid)

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By: 

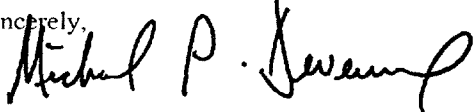
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/27/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,



Michael P. Devereux  
Chief Financial Officer



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May 28, 2004

Office of Nutritional Products, Labeling &  
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Food and Drug Administration  
5100 Paint Branch Parkway  
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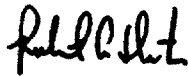
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Whole Heart Multivitamin™	Recent research has shown that Vitamin D is important to the maintenance of electrolyte balance, volume balance and helps support the retention of healthy blood pressure levels that are already within normal limits.*	Vitamin D (as cholecalciferol)

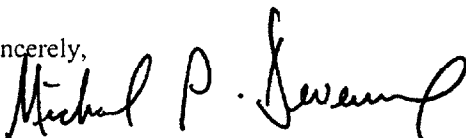
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By:   
Robert C. Doster  
Title: Senior Vice President of Scientific Affairs

Date: 5/28/04

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Chief Financial Officer



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May 28, 2004

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Whole Heart Multivitamin™	Vitamin E is an antioxidant, which inhibits the oxidation of low density lipids by inactivating free radicals.*	Vitamin E (as d-alpha tocopheryl acid succinate)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

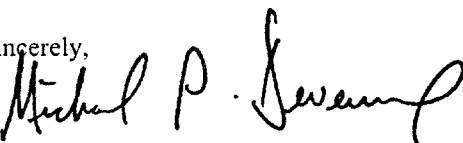
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

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May 28, 2004

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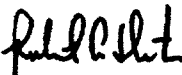
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Whole Heart Multivitamin™	Believed to inhibit catabolism of certain fatty acids that help form cell structures, especially membranes.*	Vitamin E (as d-alpha tocopheryl acid succinate)

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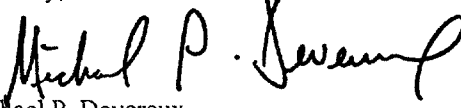
Robert C. Doster

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May 29, 2004

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Whole Heart Multivitamin™	Maintains a regular heartbeat and supports healthy circulation through the pumping ability of the heart muscle.*	Thiamine (as thiamin HCl) (vitaminB1)

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By: 

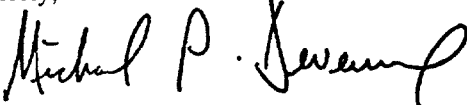
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/29/04

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P: 920.469.9099 ♦ F: 920.469.4418 (Phyto)

May 29, 2004

Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 810  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Whole Heart Multivitamin™	In clinical studies, riboflavin has shown significant benefit for heart health, and functions synergistically with other heart healthy nutrients.*	Riboflavin (vitamin B2)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: \_\_\_\_\_

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: \_\_\_\_\_

5/29/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

Michael P. Devereux  
Chief Financial Officer



## ENZYMATIC THERAPY

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Whole Heart Multivitamin™	In lipid metabolism, supports healthy cholesterol production and assists in triglyceride breakdown to retain healthy cholesterol levels that are already within normal limits.*	Niacin (as niacinamide and niacin)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

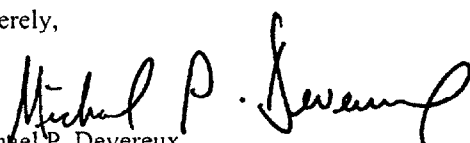
Robert C. Doster

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Date: 5/30/04

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Whole Heart Multivitamin™	Through peripheral vasodilatation, niacin supports the retention of healthy blood pressure that is already within normal limits.*	Niacin (as niacinamide and niacin)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 


Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/30/04

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Michael P. Devereux  
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Whole Heart Multivitamin™	In clinical studies, when combined with other heart healthy nutrients supported the muscle strength of the heart.*	Pantothenic Acid (as calcium D-pantothenate)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: \_\_\_\_\_

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: \_\_\_\_\_

5/30/04

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Chief Financial Officer



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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Whole Heart Multivitamin™	In a clinical study of men and women who are aged from 65 to 102, an extremely significant direct correlation was found between zinc and support for healthy aortic valves.*	Pantothenic Acid (as calcium D-pantothenate)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

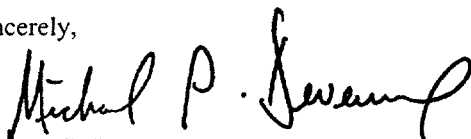
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/30/04

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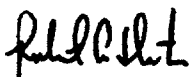
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Whole Heart Multivitamin™	Clinical trials have shown that zinc significantly supports cardiovascular health.*	Pantothenic Acid (as calcium D-pantothenate)

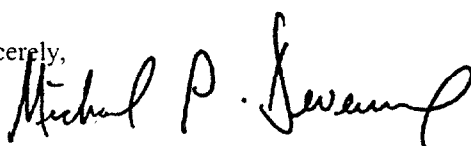
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By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/30/04

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Whole Heart Multivitamin™	Research has revealed that selenium supports cardiovascular function.*	Selenium (as L-selenomethionine)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

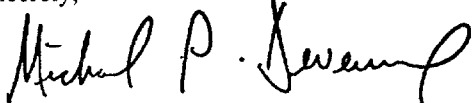
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/30/04

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Sincerely,



Michael P. Devereux  
Chief Financial Officer



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RE: Label Claims/Disclaimers

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Whole Heart Multivitamin™	Copper provides significant support for healthy heart muscles.*	Copper (as copper gluconate)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

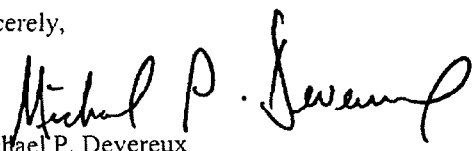
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/30/04

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Chief Financial Officer



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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Whole Heart Multivitamin™	Helps support the retention of healthy cholesterol levels that are already within normal limits.*	Chromium (as chromium picolinate)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

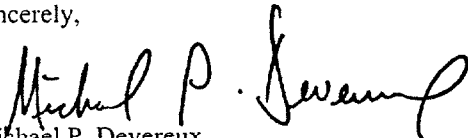
By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/30/04

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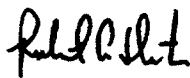
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Whole Heart Multivitamin™	Supports healthy iron metabolism and supports healthy uric acid production.*	Molybdenum (as sodium molybdate)

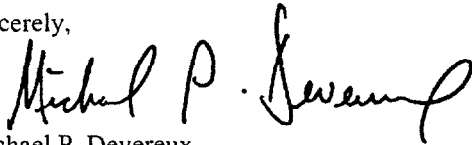
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Title: Senior Vice President of Scientific Affairs

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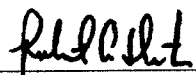
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Whole Heart Multivitamin™	Functions as a cofactor for three enzymes, which contributes to the antioxidant capacity of the blood and also plays a role in the metabolism of drugs and toxins.*	Molybdenum (as sodium molybdate)

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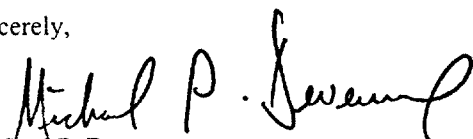
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RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Whole Heart Multivitamin™	An antioxidant that supports the retention of healthy cholesterol and blood pressure levels that are already within normal limits.* Also helps maintain healthy heart pumping ability.*	Alpha Lipoic Acid

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: \_\_\_\_\_

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: \_\_\_\_\_

5/30/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

Michael P. Devereux  
Chief Financial Officer



## ENZYMATIC THERAPY

A CORPORATION

*What **Better** feels like.™*

### INTEGRATIVE THERAPEUTICS INC.™

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Wilsonville, OR 97070  
P: 503.582.8386 ♦ F: 503.582.0467

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P: 920.469.9099 ♦ F: 920.469.4418 (Phyto)

May 30, 2004

Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 810  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Whole Heart Multivitamin™	An antioxidant that provides protection to the inside surfaces of artery walls.*	Lycopene

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Whole Heart Multivitamin™	An antioxidant plays a role in the antioxidant cascade that neutralizes the energy of reactive oxygen.*	Lutein

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By: 


Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/30/04

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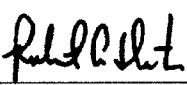
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Whole Heart Multivitamin™	An essential trace element supports glucose and lipid metabolism.*	Vanadium

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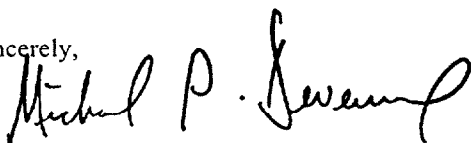
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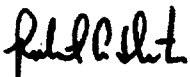
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Whole Heart Multivitamin™	Research has demonstrated that the reduction of elevated homocysteine levels and prevention of free radical formation supports cardiovascular health. The specific vitamins, homocysteine lowering agents and antioxidants in Whole Heart Health Multivitamin have been shown to provide superior nutritional support for heart health, support the reduction of elevated homocysteine levels, and interfere with free radical formation.*	Vitamin A (75% as beta carotene and as retinyl acetate), Vitamin C (ascorbic acid), Vitamin D (as cholecalciferol), Vitamin E (as d-alpha tocopheryl acid succinate), Thiamin (as thiamin HCl) (vitamin B1), Riboflavin (vitamin B2), Niacin (as niacinamide and niacin), Vitamin B6 (as pyridoxine HCl), Folic Acid, Vitamin B12 (as cyanocobalamin), Biotin, Pantothenic Acid (as calcium D-pantothenate), Calcium (as calcium carbonate and calcium citrate), Iodine (as potassium iodide), Magnesium (as magnesium aspartate and magnesium oxide), Zinc (as zinc gluconate), Selenium (as L-selenomethionine), Copper (as copper gluconate), Manganese (as manganese citrate), Chromium (as chromium picolinate), Molybdenum (as sodium molybdate), Sodium, Choline Bitartrate, Alpha Lipoic Acid, Lycopene, Lutein (from Calendula officinalis), Vanadium (as vanadyl sulfate), Zeaxanthin (from Calendula officinalis)

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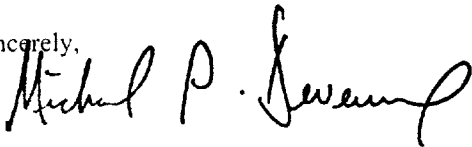
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